

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

Philadelphia Indemnity Insurance Company,)

Plaintiff,)

vs.)

Richard Alexander Murdaugh. Richard)
Alexander Murdaugh, Jr. and Renee S.)
Beach, as Personal Representative of the)
Estate of Mallory Beach,)

Defendants.)

C.A. No.: 9:19-cv-2782-RMG

**DEFENDANT BEACH'S ANSWERS
TO LOCAL CIVIL RULE 26.01
INTERROGATORIES**

**DEFENDANT BEACH'S RESPONSES TO
LOCAL RULE 26.01 INTERROGATORIES**

Pursuant to Rule 26.01 of the Local Civil Rules of the United States District Court for the District of South Carolina, as amended, the following responses to Interrogatories are hereby submitted on behalf of the Defendant Renee S. Beach, as Personal Representative of the Estate of Mallory Beach, pursuant to Rule 17, FCRP.

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Defendant Beach is not aware of any person or legal entity that has a subrogation interest in any of the claims asserted herein.

(B) As to each claim, state whether it should be tried by jury or non-jury and why.

RESPONSE: Defendant Beach is not requesting a jury trial.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary,

partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Not applicable.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: This claim is proper in this division because the insurance policy at issue in this matter was issued in Hampton County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Upon information and belief, this action is unrelated to any other filed in this District.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendant Beach is properly identified.

(G) If you contend that some other person or legal entity is in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: Not applicable.

s/ Mark B. Tinsley
Mark B. Tinsley Fed. ID No. 7160
P.O. Box 1000
265 Barnwell Highway
Allendale, SC 29810
(803) 584-7676
(803) 584-3614 (facsimile)
mark@goodingandgooding.com
ATTORNEY FOR DEFENDANT BEACH

December 13, 2019
Allendale, South Carolina.